

### **REMARKS**

Claims 1-38 were rejected by the Examiner. Claims 1-38 are still pending. Claims 1, 2, 13, 15, 17, 19, 21, 22, 25, 27, 29, and 36 have been amended. Reconsideration is respectfully requested in view of the amendments above and the following remarks.

#### **Claim Rejections under 35 U.S.C. § 103(a)**

Claims 1, 3-27, 29-34, and 36-38 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,857,201 issued to Wright et al. (hereinafter referred to as "Wright"). Claim 2 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wright as applied to claim 1 above, and further in view of U.S. Patent No. 6,182,274 issued to Lau. Claim 28 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wright as applied to claim 27, and further in view of U.S. Patent No. 6,754,670 to Lindsay et al. Claim 35 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wright as applied to claim 29 above, and further in view of U.S. Patent No. 5,604,906 issued to Murphy et al. Applicants respectfully traverse.

Wright discloses an improved system whereby software programs running on client devices are permitted to utilize occasional connections in lieu of persistent connections and which are further permitted to operate over low-performance, low-overhead communication channels. In their proposed method, Wright et al. detail an application based, programmatic solution directed to improving the capability of custom designed programs.

In general, the system of Wright proposes creating pared down, shadow applications representing one or more enterprise backend applications for execution on remote, frequently disconnected client systems. In Wright's concept, while a client device is disconnected from a desired enterprise backend application, the client device is able to operate a shadow version of a desired enterprise backend application as if connected to the actual backend application. Periodically, when the client device is connected to the backend application, the shadow version and the enterprise backend application will synchronize. It is in this manner Wright proposes a system to support applications on mobile computing devices that do not rely on persistent connections to existing enterprise systems.

In particular, Wright discloses a FormLogic (FL) client/server system in which client devices occasionally connect to server systems running one or more enterprise backend systems. According to Wright, a "key component of the FormLogic client/server architecture is the FormLogic service object. The FormLogic service object allows developers to link PDA client applications for an unlimited number of user connections over a variety of transports without the need to worry about multi-user and concurrency issues. The service object allows the developers to write the application as if it were communicating with a single client, allowing them to focus on the application itself, rather than focus on communications transport, multi user, and concurrency issues." (3:44-53). In Wright, the FL service object is a targeted application consisting of instruction selected and organized to enable the service object to perform one or more tasks such as retrieve specific records based on a query, programmatically build and send records to a FL client, send asynchronous messages between the clients and server, support direct serial and modem connections, support AppleTalk and Internet network connections, OCX implementation allowing integration with a host of development tools, customize the FL client connection dialog during connections complete software distribution interface allowing developers to programmatically install FL forms, agents and tables during connections, as well as perform other operations. (7:54-8:4). As evident from Wright's own words, the service object of Wright varies greatly from a data model defining one or more data element, data relationship, data dependency and data distribution attributes required for interfacing a mobile software application with an enterprise backend application or object as defined and claimed in the instant application. Further, again in Wright's own words, the service object of Wright is integral with an associated client and/or a backend application and, as such, may be starkly contrasted with a data model decoupled from a particular software application or backend application as defined and claimed in the instant application.

Also in Wright, a "FL client 136 includes an FL Engine 160 which allows FormLogic applications to execute on a variety of handheld devices." (5:16-18). "The FL client subsystem 136 preferably includes the FL Engine 160 comprising a user interface (UI) 162, a script engine 164, a communications module 166, and a data store 168." (5:30-33). "The communication module 166 packages data that is either being received or sent by the FL Engine 160 and handles interfacing the FL Engine to the FL Server 132 through the modem 134, the Internet 140 or the direct serial connection 147." (5:36-40). "The FL server 132 provides the ability to link hardware devices

running the FL Engine 160 to access existing enterprise data sources on an occasional basis.” (6:22-24). “The FormLogic Server 132 serves as a “gateway” between FormLogic Clients (e.g., 136, 142, 146) and enterprise data sources (e.g., 180, 182).” (6:28-30). Here too, in Wright’s own words, the FL engine and communications module are tied to a particular client and backend application. Further, like the service object, the FL engine and communications module of Wright are targeted applications consisting of instructions selected and organized to allow the FL engine and communications module to perform one or more specific tasks.

According to Wright, in order to keep data on the FL clients and data in FL server backend applications in sync, the FL clients occasionally connect to an FL server. “Each of these connections is referred to as a ‘session’, during which time a specified set of operations are performed between the FL client and FL server.” (6:49-51). “Communications agents, also just known as ‘agents’, are developed to describe the communications ‘session’. Communications agents know how to connect to a particular host, perform a set of operations or tasks, which usually includes synchronizing the host data source, e.g., 180, with the client database 172, and then disconnecting.” (6:63-7:1). “In general, communications agents are designed to encompass the fundamental operations that are needed to exchange data between a client and a host for a particular application.” (7:7-10). Further, a “set of tasks are provided or handled by a service. A service defines the relationship between a client application and an enterprise data source.” (7:45-47). Again, in Wright’s own words, “communication agents are designed to encompass the fundamental operations that are needed to exchange data between a client and a host for a particular application” and, in contrast to the data model claimed in the instant application, are tied to a particular client and/or enterprise backend application. Further, as self contained applications, Wright’s communications agents do not contemplate a data model defining one or more data element, data relationship, data dependency and data distribution attributes required for interfacing a mobile software application with an enterprise backend application or object as defined and claimed in the instant application.

As described in the specification of the present application, programmatic solutions like Wright are fraught with disadvantages. In one aspect, programmatic models are characterized by their inflexibility. In addition, programmatic models, as evidenced in the citations from Wright above, are highly procedural, functioning as a layer underneath custom programs and reacting

directly to commands and messages issued by these programs. The primary, if not sole, functionality and value in such systems is limited and driven by the custom-developed code utilizing the services, further reflecting their inherent inflexibility. In a particular instantiation of a system like Wright, a hard-wired connection with a specific resource back-end, such as the remote database access and data synchronization resources referenced in Wright, is typically required. Finally, while a system like Wright may often be utilized for a number of enterprise data sources, the means by which such utilization may be effected relies on significant supplementary programming whenever requirements or a source is changed.

Rather than rely on data synching or such programmatic solutions as the one proposed by Wright, the present invention is unique in at least the aspect that it defines and leverages the concept of data models. As described in the specification of the present application, a data model is distinguishable from the programmatic model of Wright in a number of respects. Significantly, the data model of the present invention can be starkly contrasted with the programmatic model of Wright in at least the respect that the data model of the present invention is decoupled from a particular client interface or enterprise data source – the service objects of Wright are application program interfaces (API) facilitating one or more operations to be performed between a client device and a server system (see, *e.g.*, 3:54-4:4), the “communications agents are designed to encompass the fundamental operations that are needed to exchange data between a client and a host for a particular application” (see, *e.g.*, 7:7-10). In addition to being decoupled from a particular client interface or enterprise data source, the present invention can be differentiated from Wright’s proposed solution through the present invention’s utilization of a data model which independently describes data attributes required for a mobile software application to interface with a backend application, including transactions, connections between individual data elements, relationships and dependency relationships, as well as distribution attributes.

In light of the above, it is evident Wright fails to anticipate, disclose, teach or otherwise suggest a method including, among other steps, “distributing the software platform to a second enterprise, the software platform including a data modeling program allowing creation of a data model defining one or more data element, data relationship, data dependency and data distribution attributes required for interfacing a mobile software application with at least one of the plurality of backend applications and a deployment feature allowing deployment of at least a portion of the data

model to a plurality of mobile computing devices” as claimed in Applicants’ amended claim 1. Accordingly, Applicants respectfully request that the Examiner reconsider the rejection to Claim 1, withdraw the rejection and allow Claim 1.

Wright further fails to anticipate, disclose, teach or otherwise suggest a method as claimed in claim 1 and “wherein the data model is decoupled from a particular mobile software application and a particular backend application” as claimed in claim 2. Accordingly, Applicants respectfully request that the Examiner reconsider the rejection to Claim 2, withdraw the rejection and allow Claim 2.

Claims 2-14 depend from and provide further patentable limitations to independent Claim 1. Applicants respectfully request that the Examiner reconsider the rejection to Claims 2-14, withdraw the rejections and allow Claims 2-14.

Similarly, Wright fails to anticipate, disclose, teach or otherwise suggest a system integration method including, among other elements, “an integration unit operable to access a backend application of the first enterprise network, the integration unit further operable to access a first data model defining one or more data element, data relationship, data dependency and data distribution attributes required for interfacing a mobile software application with a backend application and referencing at least one enterprise object associated with the backend application” as claimed in Applicants’ amended claim 15. Accordingly, Applicants respectfully request that the Examiner reconsider the rejection to Claim 15, withdraw the rejection and allow Claim 15.

Wright further fails to anticipate, disclose, teach or otherwise suggest a method as claimed in claim 15 further comprising “developing a mobile software application for deployment on a mobile computing device, the mobile software application operable to reference one or more data attributes of the first data model when interfacing with a backend application” as claimed in Applicants’ amended Claim 19. Accordingly, Applicants respectfully request that the Examiner reconsider the rejection to Claim 19, withdraw the rejection and allow Claim 19.

Claims 16-24 depend from and provide further patentable limitations to independent Claim 15. Applicants respectfully request that the Examiner reconsider the rejections to Claims 16-24, withdraw the rejections and allow Claims 16-24.

Further, Wright fails to anticipate, disclose, teach or otherwise suggest a method of distributing a software platform including, among other elements, “a software tool for creating a

mobile data model, the mobile data model associated with data from the enterprise software system and defining one or more data element, data relationship, data dependency and data distribution attributes required for interfacing a mobile software application with the enterprise software system” as claimed in Applicants’ amended Claim 25. Accordingly, Applicants respectfully request that the Examiner reconsider the rejection to Claim 25, withdraw the rejection and allow Claim 25.

Claim 26 depends from and provides further patentable limitations to independent Claim 25. Applicants respectfully request that the Examiner reconsider the rejection to Claim 26, withdraw the rejections and allow Claim 26.

Further, Wright fails to anticipate, disclose, teach or otherwise suggest a method including, among other elements, “mobility deployment code for deploying at least a portion of a data model defining one or more data element, data relationship, data dependency and data distribution attributes required for interfacing a mobile software application with an enterprise backend application or object to a mobile computing device” as claimed in Applicants’ amended Claim 27. Accordingly, Applicants respectfully request that the Examiner reconsider the rejection to Claim 27, withdraw the rejection and allow Claim 27.

Claim 28 depends from and provides further patentable limitations to independent Claim 27. Applicants respectfully request that the Examiner reconsider the rejection to Claim 28, withdraw the rejections and allow Claim 28.

In addition, Wright fails to anticipate, disclose, teach or otherwise suggest a method including, among other elements, “mobility deployment code for deploying at least a portion of a data model defining one or more data element, data relationship, data dependency and data distribution attributes required for interfacing a mobile software application with an enterprise backend application or object to a mobile computing device” as claimed in Applicants’ amended claim 29. Accordingly, Applicants respectfully request that the Examiner reconsider the rejection to Claim 29, withdraw the rejection and allow Claim 29.

Claims 30-35 depend from and provide further patentable limitations to independent Claim 29. Applicants respectfully request that the Examiner reconsider the rejection to Claims 30-35, withdraw the rejection and allow Claims 30-35.

Finally, Wright fails to anticipate, disclose, teach or otherwise suggest a method comprising, among other elements, “mobility deployment code for deploying at least a portion of a data model

defining one or more data element, data relationship, data dependency and data distribution attributes required for interfacing a mobile software application with an enterprise backend application or object to a mobile computing device” as claimed in Applicants’ amended Claim 36. Accordingly, Applicants respectfully request that the Examiner reconsider the rejection to Claim 36, withdraw the rejection and allow Claim 36.

Claims 37-38 depend from and provide further patentable limitations to independent Claim 36. Applicants respectfully request that the Examiner reconsider the rejections to Claims 37-38, withdraw the rejections and allow Claims 37-38.

#### **Claim Rejections under 35 U.S.C. § 112**

Claims 15-24 and 27-35 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as their invention. Applicants have amended claims 15, 17, 21, 22, 27 and 29 to overcome the Examiner’s rejections. Applicants respectfully assert that the amendments to claims 15, 17, 21, 22, 27 and 29 obviate the Examiner’s rejection of claims 15-24 and 27-35 under 35 U.S.C. § 112, second paragraph, and request the Examiner reconsider the rejections, withdraw the rejections and allow claims 15-24 and 27-35.

#### **Double Patenting Rejections**

Claims 1, 6 and 13 were provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 22 and 23 of copending United States Application No. 09/848,770. Claims 1, 6-16, 20-27, 29 and 36 were provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1-12, 14-17, and 19-22 of copending United States Application No. 09/848,970.

Filed herewith in compliance with 37 CFR 1.321(c) is a Terminal Disclaimers covering copending Application No. 09/848,970. Accordingly, Applicants respectfully request that the Examiner withdraw the provisional obviousness-type double patenting rejection of claims 1, 6-16, 20-27, 29 and 36.

Application No. 09/848,952  
Amendment dated February 10, 2005  
Reply to Office Action of August 10, 2005

Filed herewith in compliance with 37 CFR 1.321(c) is a Terminal Disclaimers covering co-pending Application No. 09/848,770. Accordingly, Applicants respectfully request that the Examiner withdraw the provisional obviousness-type double patenting rejection of claims 1, 6 and 13.



Application No. 09/848,952  
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### CONCLUSION

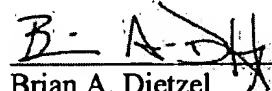
In light of the remarks set forth above, Applicants believe that they are entitled to a letters patent in the present matter. Applicants respectfully solicit the Examiner to expedite prosecution of this patent application to issuance. Should the Examiner have any questions or feel that further prosecution of this matter may be expedited through an interview, the Examiner is encouraged to telephone the undersigned.

The Commissioner is authorized to charge \$130.00 as fee for the terminal disclaimers we are submitting with this response to Deposit Account No. 23-2415 (Docket No. 26625-704) and any additional fees which may be required, including petition fees and extension of time fees.

Respectfully submitted,

Date: August 10, 2005

By:

  
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**Amendments to the Figures**

The Examiner objected to Figures 1-4, and 11-16. Figures 11 and 14 were objected to as containing grayscale images that do not produce satisfactory reproduction. Figures 1-4, 11-13, 15 and 16 were objected to as containing text less than 1/8 of an inch in height.

Figures 1-4, 11-13, 15 and 16 have been revised to increase the size of the text contained therein. Replacement sheets for Figures 1-4, 11-13, 15 and 16 are attached hereto in Exhibit A.

Figures 11 and 14 have been revised to remove the grayscale portions included therein. Replacement sheets for Figures 11 and 14 are attached hereto in Exhibit A.

Applicants respectfully submit that the Replacements Sheets for Figures 1-4 and 11-16 introduce no new subject matter in the present application. As such, Applicants respectfully request that the Examiner reconsider the objections to Figures 1-4 and 11-16 and withdraw the objections. Finally, Applicants will submit formal illustrations of the Figures upon the Examiner's allowance of one or more claims.

# ATTACHMENT A